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Attorneys for Defendant
KEYPOINT GOVERNMENT SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONALD LOUNIBOS, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

KEYPOINT GOVERNMENT
SOLUTIONS, INC., a Delaware
Corporation, and Does 1-10, inclusive,

Defendants.

Case No. 12-CV-0636 (EMC)

**NOTICE OF SETTLEMENT; JOINT
STIPULATION AND [PROPOSED] ORDER
TO VACATE CASE MANAGEMENT
CONFERENCE AND SET DEADLINE FOR
FILING MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT** (CMC reset for 2/14/13 at 1:30 p.m.)

STIPULATION

Plaintiff Donald Lounibos (“Plaintiff”) and Defendant Keypoint Government Solutions, Inc. (“Defendant”) (collectively “the Parties”), stipulate and agree as follows:

WHEREAS, on November 2, 2012, the Parties had a full day mediation session with the Hon. David Garcia (Ret.) (“Judge Garcia”) at JAMS in San Francisco, California, at which the Parties were not able to settle the case but agreed to continue settlement discussions;

WHEREAS, the Parties since the last mediation session continued settlement discussions through Judge Garcia and on November 14, 2012, the Parties reached a settlement in principle based on the terms discussed at the mediation and based on further discussions and proposals made by the Parties and by Judge Garcia and have resolved this matter on a class-wide basis;

WHEREAS, this case currently is scheduled for a Case Management Conference on November 30, 2012 at 10:30 A.M. (“the Case Management Conference”);

WHEREAS, the Parties believe it would conserve judicial resources and promote efficiency to vacate the Case Management Conference in light of the resolution of this case;

WHEREAS, the Parties have agreed that Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (“Motion For Preliminary Approval”) shall be filed on or before January 10, 2013, and shall be set for hearing on February 14, 2013, or as soon thereafter as is convenient for the Court;

WHEREAS, there is no trial date set for this case;

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IT IS HEREBY STIPULATED by the Parties herein, through their counsel of record, as follows:

The Case Management Conference shall be vacated and the Motion for Preliminary Approval shall be filed on or before January 10, 2013, and shall be set for hearing on February 14, 2013, or as soon thereafter as is convenient for the Court.

IT IS SO STIPULATED.

DATED: November 19, 2012

NORTH BAY LAW GROUP

/s/

David S. Harris
Attorney For Plaintiff
DONALD LOUNIBOS

DATED: November 19, 2012

LITTLER MENDELSON

/s/

Karin Cogbill
Attorneys for Defendant
KEYPOINT GOVERNMENT SOLUTIONS

[~~PROPOSED~~] ORDER

The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, IT
IS HEREBY ORDERED that: reset for 2/14/13 at 1:30

The Case Management Conference set for November 30, 2012, at 10:30 a.m. is ~~VACATED~~.^{ph.}

Plaintiff shall file the Motion for Preliminary Approval on or before January 10, 2013.

The hearing on the Motion for Preliminary Approval shall take place on February 14, 2013, at 1:30 p.m. in Courtroom 5.

DATED: November ²⁰____, 2012

